

***REMARKS***

Applicant respectfully requests reconsideration of the present application in view of the reasons that follow. The examiner's comments in his Advisory Action are appreciated. Applicants have made amendments accordingly.

Claims 1-12 were rejected under 35 USC 112, second paragraph, for indefiniteness, referencing the language "not associated with the group composition store" in claims 1 and 7. This language has been deleted and the words "networked and autonomous" has been inserted as a replacement in the middle limitation and the last limitation for both claims. This amendment thus obviates this rejection.

Claims 1-12 were rejected under 35 USC 102 (e) as being anticipated by Marshall et al. This rejection is respectfully traversed and reconsideration thereof is requested to the extent that it is applied to the claims as amended with the "networked and autonomous" language.

Marshall et al. discloses a closed composition and profile system for creating memories products based on fulfillment only by the Hallmark system. As the examiner notes, some of the content can be taken from external source. But there is no disclosure of "group composition stores that are "networked and autonomous."

Likewise, there is no disclosure of a web based system where compositions can be created on a network service that is autonomous to the Hallmark system and unified by an independent user profile that, as is required by the claim language, is accessed via a profile store that is "networked and autonomous." Note that applicant's specification also includes definitions of the graphic store, the composition store and the user profile store that clarify that they are network services. See paragraphs 26, 30, 38 and 66 of applicants' specification. In other words, a composite composition can be created by mixing and matching compositions from one or more unassociated and independent group composition stores, all unified by an independent user profile on a profile store that is networked and autonomous. Thus, because of this networked and autonomous nature of both the group composition stores and the profile stores on which the user profiles are accessed, composite compositions can be created with any number of other independent systems and entities not restricted to the Hallmark fulfillment center with its associated user profiles and shared within a specified group.

The examiner states that the Memories Product Generation System 129A shown in Fig. 1B of Marshall et al. is a group composition store which is separate and independent from the plurality of different user profiles defined in applicants' claims. This is not the case, as is evident from the

figure. First, what is disclosed in Marshal et al. is not a group composition store, i.e., a composition store that is shared by a specified set of users, based on user profiles. Second, the Memories Product Generation System 129A can only be used in the Hallmark system and the Hallmark system user profiles. Whether or not the Hallmark fulfillment center or centers are distributed, has nothing to do with whether or not the user profiles are networked and autonomous. Even when the Marshall et al. disclosure discusses distributed architecture in paragraph 33, it always refers back to the same locked-in Hallmark Memories Product Generation System 129A.

The profile store on which the user profile is accessed is defined to be “networked and autonomous.” That means that they can be used with any number of other systems and entities and act as the unifying entity in the process. In contrast, the user profiles in the Hallmark system are associated group composition store, i.e., the Memories Product Generation System 129A. They can be used with no other composition store. This is directly at odds with the claim language.

The claimed system is an open system that pulls together content that spans multiple systems, and permits compositions to be created and combined from multiple unrelated systems, i.e., the independent graphics store and the independent composition stores, and the system protocol for the claim as a whole allows compositions to be unified and specified by an independent user profile accessed from a user profile store network service. A fundamental point is that the compositions and the content in the claims are associated with the user and his/her identity and is shared among a group as defined by the user profiles, and spans multiple systems, rather than being associated and stored within a single closed Hallmark fulfillment system. To reiterate, multiple independent users can be given access to the same one or more graphics in the graphics store based on the fact that the graphic is referenced in one of the group composition stores and the fact that the accessed independent user profile includes a reference to one of the group composition stores that references such graphics materials.

An example of the system operation would be for a user to browse to the MAPQUEST web site and download and store a map to his/her house in a graphics store associated with the user. The user could then browse to an independent group composition store and add a reference to the map graphic in the graphics store. Other users in the group, through the unifying aspect of the user profiles, could now have shared-access to this map, even though the map is not physically stored in the group composition store and even though the graphics store is independent of the group composition store, and even though the other users are autonomous with the group composition store.

An interesting aspect of the invention is that it is possible with the claimed invention set forth in claim 6, to use a web extension to list compositions stored in the group composition store as being

available to a user imaging client seamlessly with other user non-shared content. Thus, in accordance with claim 6, the map in the graphics store would seamlessly show up in the imaging clients of the various members of the group as being available along with all of their other documents. The examiner cites paragraphs 57 and 70 as disclosing this claimed feature. There is nothing in these paragraphs relating to group compositions stores or the enumeration of compositions in the group composition store that are now available.

These network effects are not disclosed or suggested by Marshall et al.

In view of the foregoing amendments and remarks, reconsideration and withdrawal of the present rejection is respectfully requested, and an early passage to issue solicited.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Respectfully submitted,

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